

**Lee J. Rohn**  
(Lic. Texas and U.S.V.I.)  
[lee@rohnlaw.com](mailto:lee@rohnlaw.com)

**Mary Faith Carpenter**  
(Lic. New Jersey and U.S.V.I.)  
[maryfaith@rohnlaw.com](mailto:maryfaith@rohnlaw.com)

**Rhea R. Lawrence**  
(Lic. U.S.V.I.)  
[rhea@rohnlaw.com](mailto:rhea@rohnlaw.com)

**Lee J. Rohn and Associates, LLC**

Mailing: 1108 King Street, Suite 3  
Physical: 56 King Street, Third Floor  
Christiansted, St. Croix VI 00820  
340.778.8855 • Fax 340.773.2954

Mailing: 1026 Norre Gade, K.Q.  
Physical: 24B/24BA/24BB Norre Gade, K.Q.  
Charlotte Amalie, St. Thomas VI 00802  
340.774.8558

TOLL FREE  
866.778.0044 • Fax 866.778.0055

**Jennifer S. Koockogey-LaJoie**  
(Lic. Minnesota and U.S.V.I.)  
[jennifer@rohnlaw.com](mailto:jennifer@rohnlaw.com)

**Blake M. Feamster**  
(Lic. Oklahoma, Colorado\* and U.S.V.I.)  
[blake@rohnlaw.com](mailto:blake@rohnlaw.com)

**Natalie Nelson Tang How**  
Of Counsel  
(Lic. U.S.V.I.)  
[natalie@rohnlaw.com](mailto:natalie@rohnlaw.com)

January 25, 2023

**VIA ELECTRONIC MAIL**

Andrew C. Simpson, Esq.  
[asimpson@coralbrief.com](mailto:asimpson@coralbrief.com)  
Simone Francis, Esq.  
[simone.francis@ogletreedeakins.com](mailto:simone.francis@ogletreedeakins.com)  
Gloria Y. Park, Esq.  
[GPark@susmangodfrey.com](mailto:GPark@susmangodfrey.com)

RE: Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

Dear Counsel:

Pursuant to the Court's recent Scheduling Order, I provide you with the persons I wish to depose, exclusive of the 30(b)(6) deposition of the Defendants and OPTIS's witnesses, who will need to be scheduled after written discovery when it is completed.

- David Smith
- Merlin Figueira
- Garry Stoker
- Kenia Johny
- Andreas Constantinou
- Terrence Keogh
- Tom Kologinczak
- Charlotte Pratt-Horowitz
- Rawle Granger
- Coury Hodge
- Chetraum Persaud

January 25, 2023  
Page 2

- Frank Keich
- David Redd of Acuren Inspection Services
- 30(b)(6) Versa Integrity
- 30(b)(6) Traeger Brothers
- Sebastian Meretti

Please let me know if any will be voluntarily produced and, if not, their addresses.

I have the following dates to schedule depositions by the deadline of June 16, 2023:

- March 20<sup>th</sup>, 2023, through March 23<sup>rd</sup>, 2023;
- April; 4<sup>th</sup>, 2023, in the afternoon;
- April 5<sup>th</sup>, 2023 and April 6<sup>th</sup>, 2023;
- April 17<sup>th</sup> and April 18<sup>th</sup>, 2023;
- April 25<sup>th</sup>, 2023;
- May 18<sup>th</sup>, 2023 and May 19<sup>th</sup>, 2023;
- May 22<sup>nd</sup>, 2023 and May 23<sup>rd</sup>, 2023;
- May 24<sup>th</sup>, 2023, in the afternoon;
- May 25<sup>th</sup>, 2023 and May 26<sup>th</sup>, 2023;
- May 30<sup>th</sup>, 2023, in the afternoon and May 31<sup>st</sup>, 2023
- June 1<sup>st</sup>, 2023, in the afternoon and June 2<sup>nd</sup>, 2023
- June 5<sup>th</sup>, 2023 through June 9<sup>th</sup>, 2023;
- June 12<sup>th</sup>, 2023 through June 16<sup>th</sup>, 2023.

I will want to take the 30(b)(6) deposition starting June 2<sup>nd</sup>, 2023.

Please respond as to your available dates for depositions, so that we can tie down what dates are available, and get a deposition scheduled to the Court by the deadline.

Cordially,

A handwritten signature in blue ink, appearing to read 'Lee J. Rohn', with a stylized flourish at the end.

Lee J. Rohn, Esq.

LJR/kj